

1 Q. Is there any functionality available through
2 Ameritech's OSS systems, Mr. Rogers, which have
3 not been fully tested or not operational now? And
4 by tested, I mean either internal or involving
5 potential users?

6 A. No, there is not.

7 Q. How about the comment of several carriers that no
8 one is yet using a repair and maintenance
9 interface. Why are they not using it, do you
10 know?

11 A. I think it's a business decision today. I mean
12 until there is a critical mass of lines, the
13 volume doesn't justify the interface.

14 Q. Is this a new interface or is it one which has
15 been in use for some time?

16 A. Well, it's an interface that has been in existence
17 for a few years on the IXC side for reporting
18 troubles on circuits and telephone numbers. And
19 we have made one additional field adjustment to it
20 which was a dispatch authorization so it can be
21 used on the CLEC side.

22 Q. You've tested it?

23 A. Yes, we have.

24 Q. Is there any reason in the world to doubt that it
25 works satisfactorily?

1 A. No, there isn't.

2 Q. Is it in any respect, any material respect,
3 different from what has been in use for these
4 several years?

5 A. With the exception of that --

6 Q. One field?

7 A. -- one field, yes.

8 Q. To put the problem in perspective or the problem
9 on use in perspective, what is on average
10 Ameritech's -- with what frequency do you need to
11 make your repair and maintenance call?

12 A. It's different in each state, but I don't know the
13 individual states.

14 Q. Wisconsin, can you confine your answer to
15 Wisconsin?

16 A. No, I can't. The aggregate number I believe is
17 three-and-a-half percent.

18 Q. Three-and-a-half percent of what?

19 A. Of the embedded base. Three-and-a-half percent of
20 the embedded base, we have trouble reports with
21 three-and-a-half percent of the embedded base per
22 month.

23 Q. Given the current volume of resold product and
24 given that average requirement or that average
25 need for repair maintenance, do you know whether

1 or not there would even have been yet a reason or
2 need to contact Ameritech for repair and
3 maintenance electronic?

4 A. I can't speak to the CLECs, what their field,
5 whether or not they would need it. But I believe
6 that most of them the priorities are in doing the
7 other interfaces, the billing and the ordering.

8 Q. With respect to the billing interfaces, MCI
9 complains that Ameritech forces it to use AEBS,
10 are you familiar with that?

11 A. Yes, I am.

12 Q. Not their complaint. Are you familiar with the
13 system?

14 A. Yes.

15 Q. Is it used elsewhere by Ameritech?

16 A. Yes, it's a billing system that's been in
17 existence for probably five or six years used for
18 billing large customers.

19 Q. Does it work?

20 A. Yes, it does.

21 Q. Is there any basis whatsoever for MCI to complain
22 that it must use it too?

23 A. Not in my opinion.

24 MR. DAWSON: I have nothing further, Mr.
25 Rogers. Thank you very much.

1 EXAMINER JAMES: Is there any recross
2 based on the redirect?

3 MS. MARSH: Yes, AT&T has some recross.

4 EXAMINER JAMES: Anybody else?

5 (No response.)

6 EXAMINER JAMES: Ms. Marsh.

7 Recross-Examination

8 By Ms. Marsh:

9 Q. Do you know who Nancy Barron is?

10 A. No, I do not.

11 Q. Do you know who Steve Owczaruk is?

12 A. Yes, I do.

13 Q. Does he work for you?

14 A. Yes, he does.

15 Q. And were you aware that on 2/26 Mr. Owczaruk and
16 others in the Ameritech organization talked to
17 AT&T individuals about the late 865 problem?

18 A. No, I was not aware of that.

19 Q. And so when you met with AT&T on Tuesday, were you
20 aware of the fact that that was not the first time
21 that problem was discussed?

22 A. I don't know what happened prior to that. I just
23 heard in the meeting that I had.

24 Q. Are you aware of the fact that AT&T employees
25 provided Ameritech employees with information

1 about the late 865 problem on as early as 1/28/97?

2 A. No, I'm not.

3 Q. Now, you have provided us with some testimony
4 about your conclusions that the Ameritech systems
5 are providing CLECs with service ordering
6 processes that are at parity with what Ameritech
7 retail representatives achieve; is that correct?

8 A. I believe I said there is nothing in the designs
9 that would cause it to not be in parity.

10 Q. Do you know how many Ameritech retail transactions
11 are rejected from Ameritech's Legacy systems on a
12 percentage basis?

13 A. How many are rejected?

14 Q. From Ameritech's Legacy systems.

15 A. In what focus? Is it all Legacy systems or just
16 is it ordering interface, EDI?

17 Q. Let's look at the ordering interface. Can you
18 tell me how many orders entered by Ameritech
19 service representatives for Ameritech customers
20 are rejected by Ameritech's Legacy systems?

21 A. No, I can't.

22 Q. Can you tell me how many orders -- Strike that.
23 Can you tell me how many orders entered by
24 Ameritech service representatives for orders for
25 Ameritech customers are subjected to manual

1 processing on a percentage basis?

2 A. Somewhere down the pipe?

3 Q. Yes. Anywhere during the course of processing
4 that order after it's entered by the service
5 representative.

6 A. No, I can't.

7 Q. Can you tell me how many Ameritech orders for
8 retail services pend in the Ameritech systems
9 beyond the due date?

10 A. No, I can't.

11 Q. Can you tell me how many Ameritech service orders
12 are completed by Ameritech systems but
13 notification is not provided to Ameritech service
14 representatives as to that completion?

15 A. The majority of them because Ameritech service
16 reps, as a business proposition they never check.
17 They never go -- the order goes to its complete
18 and they never check the results. It's assumed
19 that it completed.

20 Q. Can you tell me in how many instances an Ameritech
21 customer would call and request service, and the
22 Ameritech system would not acknowledge that
23 customer as an Ameritech customer when in fact the
24 order had been completed?

25 A. No, I can't.

1 Q. Can you tell me in how many instances an Ameritech
2 representative would attempt to retrieve the
3 status of a pending order and be unable to do so?

4 A. No, I can't.

5 Q. Can you tell me how many instances an Ameritech
6 service representative would attempt to retrieve a
7 telephone number for reservation purposes and be
8 unable to do so?

9 A. No, I can't.

10 Q. Can you tell me in how many instances an Ameritech
11 service representative would attempt to retrieve a
12 due date for installation and be unable to obtain
13 one?

14 A. No, I can't.

15 Q. Can you tell me in how many instances an Ameritech
16 service representative may attempt to access the
17 Legacy systems and be advised that the systems are
18 unavailable?

19 A. No, I can't.

20 Q. Can you tell me how long on average it takes for
21 an Ameritech customer with no dial tone to have
22 their service restored?

23 A. No, I can't.

24 Q. Can you tell me in how many instances Ameritech
25 customer service orders meet with street address

1 errors during the processing?

2 A. No, I can't.

3 Q. Can you tell me in how many instances Ameritech
4 service representatives would be unable to obtain
5 the status of a request for a repair on a pending
6 request?

7 A. No, I can't.

8 Q. Can you tell me how many Ameritech trouble tickets
9 would not be closed within five days of receipt of
10 that trouble ticket by the repair and maintenance
11 systems?

12 A. No, I can't.

13 Q. Can you tell me how many Ameritech customer bills
14 over the last two months have been in error?

15 A. No, I can't.

16 Q. Can you provide me with a comparison of actual due
17 dates assigned by the Ameritech systems to
18 Ameritech orders as opposed to any other CLEC
19 order?

20 A. No, I can't.

21 Q. Would you agree with me that for the purpose of
22 assessing parity those, all of those questions
23 might be relevant inquiries?

24 A. If it wasn't -- my testimony was that the access
25 to those systems is the same. What the actual

1 numbers are, I can't testify what the numbers
2 are. But I can testify that when we go to get a
3 telephone number, the list of telephone, the exact
4 same telephone number, we go get a due date, the
5 list of available due dates, it's the same list
6 available to the customer service rep. I can't
7 tell you what the resale. What I testified to is
8 that the availability, there is nothing in the
9 design that inhibits parity.

10 Q. In drawing your conclusions, your parity
11 conclusions, did you review any study or analysis
12 or a report as it relates to response times or due
13 dates or installation intervals as provided to
14 Ameritech service representatives for Ameritech
15 customers?

16 A. No, I did not.

17 Q. Would you agree with me the systems are not
18 providing parity if, for instance, Ameritech
19 orders are being rejected from the Legacy systems
20 at a 5 percent rate and CLEC orders are being
21 rejected from the Legacy system at say a 20
22 percent rate?

23 A. No, I would not.

24 MR. DAWSON: Without regard to the
25 reason?

1 THE WITNESS: No. I would not agree
2 with you.

3 BY MS. MARSH:

4 Q. Would you agree with me that manual processing
5 cannot provide parity as it relates to automated
6 processing in terms of timeliness?

7 A. No, I would not.

8 Q. You would not agree with me that manual processing
9 is a more time consuming process than automated
10 processing?

11 A. More time consuming, yes.

12 Q. Would you agree with me that manual processing
13 cannot provide parity as it relates to automated
14 processing in terms of accuracy?

15 A. No, I would not agree with that.

16 Q. Would you not agree with me that errors can be
17 introduced into the processing of an order if it
18 is subjected to manual intervention?

19 A. I would agree with that.

20 Q. In fact, if you could return your attention to the
21 order testing problem log.

22 MR. BERNS: Exhibit number.

23 MS. MARSH: No. 7.

24 BY MS. MARSH:

25 Q. If you could look on page 16, Mr. Rogers.

- 1 A. Which one was 7?
- 2 Q. The order testing problem log.
- 3 A. Okay.
- 4 Q. Page 16, please.
- 5 A. Okay.
- 6 Q. About halfway down on page 16 there is a problem
- 7 that is described as 865 sent for rejected orders,
- 8 do you see that entry?
- 9 A. Yes, I do.
- 10 Q. Is an 865 a notice for completion?
- 11 A. Yes, it is.
- 12 Q. And when a CLEC receives an 865, are they then to
- 13 assume that that order has been properly
- 14 completed?
- 15 A. That is correct.
- 16 Q. And if I understand this log correctly, at least
- 17 in one instance 865s were sent for orders that
- 18 were rejected; is that correct?
- 19 A. It says it categorized it that that may have been
- 20 a problem. I don't know if it actually was.
- 21 Q. Can you tell me according to this log what was the
- 22 cause of that problem?
- 23 A. No, I cannot.
- 24 Q. If you look under the notes column, do you see the
- 25 remarks this may be a manual process error?

1 A. Yes, I do.

2 Q. Do you know how many other problems that are
3 reported on Exhibit 7 that could be attributed to
4 manual process errors?

5 A. No, I do not.

6 Q. Can you return your attention, please, to the
7 exhibit headed Service Readiness Testing that Mr.
8 Dawson just asked you about.

9 A. Okay.

10 Q. I believe you provided us with some testimony as
11 to the number of rejects reflected on that that
12 could be attributable to Ameritech problems.

13 A. I believe the 11 I referred to were probably under
14 the Illinois. I don't know if any of them were in
15 Michigan.

16 Q. Do you know how many or do you have any opinion as
17 to how many rejected errors -- rejected orders in
18 the Michigan testing is attributable to any
19 Ameritech problem?

20 A. I don't believe any of them.

21 Q. Can you look at the second entry down which says
22 PIC or LPIC error and it shows 51 orders rejected?

23 A. Okay.

24 Q. Are you familiar or are you aware of the problem
25 where AT&T submitted orders in Michigan that

1 properly identified an intraLATA primary exchange
2 carrier and those orders were nonetheless
3 rejected?

4 A. They were properly identified and rejected.

5 Q. Isn't the PIC field a required field in the order?

6 A. I am not aware of those errors. PIC field is a
7 required field, yes.

8 Q. Isn't it true that AT&T submitted orders in which
9 they filled out that field as required to do so by
10 Ameritech specifications and those orders were
11 rejected?

12 A. I am not aware of that.

13 Q. And are you aware of the fact that those orders
14 were rejected because 30 percent of Ameritech's
15 switches in Michigan are not programed to allow
16 for intraLATA presubscription?

17 A. For LPIC and local PIC?

18 Q. Right.

19 A. That's correct.

20 Q. And is that the reason they were rejected, those
21 55 orders?

22 A. From my knowledge they were rejected because the
23 LPIC was provided and that it is not available in
24 all areas.

25 Q. Is there anything that AT&T did wrong in

1 submitting those orders?

2 A. It provided an LPIC in an area that's not
3 available.

4 Q. Isn't it true that AT&T was required to fill out
5 the LPIC field in all orders?

6 A. Counsel, I'm not sure about the LPIC. I know the
7 PIC is a required field, but I'm not sure the LPIC
8 is.

9 Q. And do you know how Ameritech resolved that
10 problem?

11 A. I believe we agreed that we'll kick them all out
12 for manual intervention.

13 Q. If I could show you, Mr. Rogers, and this
14 addresses the conversation we had earlier about
15 the due date report that we had marked as a
16 delayed exhibit that counsel indicated they were
17 going to make available. I believe the exhibit
18 that Mr. Rogers was referring to is actually a
19 proposed exhibit attached to Mr. Mickens'
20 testimony. What I'd like to do is clear that up
21 if I could.

22 Can I show you, Mr. Rogers, Warren
23 Mickens' schedule No. 2 attached to his testimony
24 in this docket. Can you identify for me if that
25 is the report that you have indicated you will

1 make available for this commission?

2 A. Yes, it is.

3 Q. And is that a report that Mr. Mickens has
4 sponsored in his testimony?

5 A. Yes, it is.

6 MS. MARSH: AT&T would object to the
7 submission of this report in this record because
8 Mr. Mickens is not here to be cross-examined as to
9 its contents.

10 MR. PAULSON: Mr. Mickens is proposing
11 only the format of this report. This was not
12 proposing the -- has not introduced and his
13 exhibit does not contain the actual results for
14 February or any other time. He was proposing the
15 format of the report for this commission. And
16 then the commissioners had asked for -- the
17 commissioners had asked for a report that provided
18 this information, specific information, that is
19 what we will make available as the delayed exhibit
20 being referenced.

21 Mr. Mickens was testifying as to, again,
22 the benchmarks and the form of the parity
23 reports. That was the issue to which his
24 testimony is addressed. We are specifically
25 offering that particular report in response to the

1 questions of the commissioners. The issue before
2 the commissioners is are the OSS systems
3 operational and tested. And that's what Mr.
4 Rogers is here testifying to.

5 MS. MARSH: And as I understood the
6 commission's concerns also as to whether the
7 operation support systems are providing support at
8 parity. And AT&T would object to reliance on any
9 report submitted if there is not a witness here
10 who can testify as to the information that was
11 compiled and what was looked at for purposes of
12 arriving at the conclusions that the report may
13 state.

14 EXAMINER JAMES: Was it possible to
15 provide a sponsoring witness?

16 MR. PAULSON: I'm not sure that we can
17 tomorrow. Obviously Mr. Mickens will be here
18 first thing Thursday morning.

19 EXAMINER JAMES: Well, not my
20 understanding that the commissioners will be. As
21 I understand Ameritech's proposal at this point is
22 that whatever we need to know about that report,
23 Mr. Rogers can tell us? Is that what you're
24 telling me?

25 MR. DAWSON: I don't think so.

1 EXAMINER JAMES: Okay.

2 MR. DAWSON: He is not --

3 EXAMINER JAMES: Do you have some
4 witness who can that is not Mr. Mickens who is not
5 available?

6 MR. PAULSON: I don't know that for
7 sure.

8 EXAMINER JAMES: Would you check?

9 MR. PAULSON: We will know when we
10 submit that report tomorrow.

11 EXAMINER JAMES: Does that satisfy you?

12 MS. MARSH: Yes, it does. Thank you.

13 EXAMINER JAMES: Did you have some
14 questions for recross?

15 MR. KELLEY: No.

16 Further Examination

17 By Chairman Parrino:

18 Q. My recollection of your response, I believe it was
19 to the second question from Mr. Dawson, was that
20 in your opinion there is in fact no difference
21 between processing of the CLECs either order or
22 preordering any of the elements and Ameritech's
23 processing of its own, is that a correct --

24 A. No. I believe the question was does it allow the
25 CLEC to service -- view the customers in the same

1 fashion as we do ours. There is definitely some
2 difference in the processing. We have interfaces
3 in the business units or retail business units use
4 screens to get into the system. And we extended
5 it to a common interface for 72 systems versus
6 them accessing all 72. So I can't say that
7 they're the exact same performance.

8 Q. So what you were responding to when Mr. Dawson
9 asked you two questions essentially was that a
10 CLEC has access to the same information but not
11 necessarily that the processing or that the timing
12 of the processing would be the same between a CLEC
13 and Ameritech?

14 A. From an ordering perspective and from a trouble
15 reporting once the order is in the ordering system
16 or in the trouble reporting system, it is my
17 belief that since systematically there is no
18 difference between a CLEC order or a CLEC trouble
19 and an Ameritech order or trouble, that they would
20 be processed the same.

21 Q. And my question is upon what underlying
22 information are you basing that opinion or belief?

23 A. The way the systems were designed.

24 Q. So again, you are talking about how the systems
25 were designed to operate. You do not have access

1 to any actual information or specific information
2 such as what Ms. Marsh was getting at in her
3 redirect?

4 A. That is correct.

5 Q. Ms. Marsh also asked you some questions with
6 regard to when you were aware that there was an
7 865 problem.

8 A. That is correct.

9 Q. And she indicated that your staff had been made
10 aware as early as January 28th of 1997. And I
11 believe you indicated that you were not aware of
12 that; is that correct?

13 A. That is correct.

14 Q. And if Ms. Marsh is correct that your staff was
15 aware that there was an 865 problem as of January
16 28th and you went to your staff to see whether
17 everything was operational and you got the
18 response yes, and that's the basis for you saying
19 to the commission that everything is operational.
20 I guess should I be concerned that if in that one
21 area you got incorrect information from the staff
22 that there may be other problems as well?

23 A. Well, when this happened, I mean right after I had
24 the meeting with AT&T, and it was abrupt, we had
25 quite a lengthy discussion with me and my staff

1 and other people involved in this to determine
2 whether or not what you just mentioned was indeed
3 the case. Was this an isolated case or was there
4 a lot of other things that I wasn't being told.

5 And I was assured that this was just a
6 judgment call on this trouble based on the belief
7 of how Ameritech processes orders and Ameritech
8 interacts with the customer that it wasn't a
9 trouble. It wasn't -- it didn't -- I didn't get
10 the indication that this was a systematic problem
11 I needed to be concerned with.

12 Q. If I look at, and I can't remember which exhibit
13 it is right now, but there were some -- we were
14 led through several specific instances where there
15 was identified an 865 problem. Are you saying
16 that that problem did not occur with enough
17 regularity that your staff brought that to your
18 attention or that your staff did not consider it
19 as a serious problem?

20 A. I think the latter.

21 Q. And can you tell me why they didn't consider it a
22 serious problem?

23 A. Because the end result was if it was a new line or
24 a thing that the customer had service, it was a
25 delay in getting the information to the CLEC, that

1 the whole process was complete. And I would say
2 from the Ameritech perspective when we first went
3 through and looked at the different functionality
4 and different things we were providing, we
5 actually got a lot of kickback from the retail
6 units saying why are you providing that. That's
7 information that we don't use and we don't have
8 access to, so why are you providing to the CLECs.
9 And we said we thought we needed to. So they from
10 using that as a basis, they didn't feel it was
11 that detrimental that they weren't getting.

12 Q. So if I can try to characterize what you're
13 saying, it's your understanding that your staff
14 did not consider it as a serious problem because
15 Ameritech for their own accounts is not getting
16 that information. So again, from a parity
17 standpoint, you're treating a CLEC just like you
18 are your own accounts?

19 A. After I found out what it was, we went in and
20 found out what the causes of it were. It's not
21 really -- it's not just one thing that's causing
22 the 865. In some cases the Ameritech systems what
23 we do is we look at when the system is completed,
24 and it prints out a report that says that this
25 order is completed. So we are using that report

1 as a basis to notify the CLEC that the order is
2 complete. And in some cases the order wasn't
3 making it to that report.

4 And it was, same thing that's happened
5 in the retail side, but it hasn't been -- it's
6 never been identified because that data was not
7 used to the extent that it was used where you can
8 do a one to one for every order I send, you should
9 get a report. That type of scrutiny was not done
10 on the retail side. So what we're finding is that
11 the trouble is in the back-end Legacy systems
12 providing us the information that the order
13 completed. And the retail side just wasn't using
14 it with direct regularity that the CLEC was.

15 Q. In earlier cross I had asked what other problems
16 there were with -- what other bugs were in the
17 MORTEL system. And you mentioned an 860 problem
18 which is when there is a change to the order that
19 there was some concern with that. Was that a
20 problem that was identified by your staff to you,
21 or is this another example where the staff would
22 not have considered this a serious problem?

23 A. No, this one was identified to me.

24 Q. And even with that problem, do I understand now
25 that you have changed your testimony that with

1 regard at least to these two items that the OSS is
2 currently not fully operational?

3 A. With the one. The 860 is on the next release.

4 Q. But the 865 problem has been rectified?

5 A. I am not sure if the 865 has been rectified. It
6 wasn't when I checked on it.

7 CHAIRMAN PARRINO: Thank you.

8 EXAMINER JAMES: Anything further for
9 this witness?

10 (No response.)

11 EXAMINER JAMES: You may stand down.

12 (Witness excused.)

13 MS. MARSH: A housekeeping matter. We
14 have better copies now of Exhibit 10 which was the
15 volume report and part of Exhibit 3. I don't know
16 how you would like me to handle that and replace
17 the record. We also have copies of the redacted
18 exhibit, Delayed 6 exhibit, we now have copies of
19 that redacted. So we can submit that for the
20 record as well.

21 EXAMINER JAMES: What I think we'll do
22 with that page of Exhibit 10 is I think we will
23 call it Exhibit 10-A and just identify it as a
24 replacement for the page that's in there. I don't
25 like taking an exhibit apart.

1 (Exhibits 3A and 6 marked.)

2 EXAMINER JAMES: Any objection to
3 Exhibit 6?

4 (No response.)

5 EXAMINER JAMES: We'll accept Exhibit 6
6 also.

7 (Exhibits 3A and 6 received.)

8 EXAMINER JAMES: The next witness is
9 going to be Mr. Parrish. And his testimony is
10 going to be -- is testimony is in the form of a
11 letter, and it will be marked as an exhibit.

12 (Exhibit 10 marked.)

13 EXAMINER JAMES: Mr. Parrish's letter
14 will be Exhibit 10.

15 STEVEN PARRISH, USN WITNESS, DULY SWORN

16 EXAMINER JAMES: While we were off the
17 record, we received into evidence Exhibit 3A which
18 is a legible copy of a portion of Exhibit 3, and
19 Exhibit 6 which was delayed and has now been
20 received. And we have also had marked Mr.
21 Parrish's letter which is his proposed testimony
22 essentially in this case. Is there any problem on
23 anyone's part with our accepting Exhibit 10?

24 (No response.)

25 EXAMINER JAMES: Exhibit 10 is

1 received.

2 (Exhibit 10 received.)

3 Examination

4 By Examiner James:

5 Q. Do you want to give us your name and address?

6 A. My name is Steven J. Parrish. I live at 1414
7 Scottdale Road, La Grange Park, Illinois. I'm the
8 executive vice president of operations for USN
9 Communications which is headquartered in Chicago,
10 Illinois.

11 Q. What's the purpose of your testimony at this
12 point?

13 A. My testimony was to provide comments I believe on
14 question No. 9 related to our Ameritech OSS's
15 testing operational. We've been in service since
16 August 19th of last year in Illinois and then
17 subsequently in Ohio and Michigan. And we utilize
18 some of these systems for providing services for
19 our customers.

20 Q. Do you have any other remarks you would like to
21 make at this point?

22 A. Just a little background. We're a total service
23 provider in that we provide local, long distance,
24 internet, paging and our services to our
25 customers. Our target customer base is primarily